

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	08/07/2026
Application number:	PL/2026/02266
Proposal:	Erection of 9 residential dwellings, access, parking, gardens, landscaping and associated works
Site address:	Land south of Park Street, Warminster
Case officer:	Andrew Thomas

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	GCN	Habitat Regs, Wiltshire CP50	08/07/2026 -IACPC certificate must also be signed by the applicant	
	Phosphorus neutrality	Habitat Regs, Wiltshire CP50	08/07/2026 -Clarification of PTP and whether it will support the neighbouring property + entire development -Mitigation strategy, and mechanism through which to secure said mitigation	

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer. Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

Thank you for consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Information considered:

- Preliminary Ecological Appraisal, BN Ecology, February 2026
- Great Crested Newt District Level Licensing Impact Assessment & Conservation Payment Certificate
- Nutrient Budget, Holbury Consultancy Service, March 2026
- Natural England Nutrient Neutrality budget calculators for the River Avon SAC, for:

- Septic tank (existing)
- PTP replacement of septic tank
- Development (9 dwellings)
- Biodiversity Net Gain, BN Ecology, February 2026
- Statutory Biodiversity Metric, James Mansfield, April 2026
- Condition assessment sheets
- Pre-development Baseline Habitat Plan, BN Ecology
- Post-intervention Proposed Habitat Plan, BN Ecology
- Site Layout, Cox Martin Design, February 2026, p6

The site is in a semi-rural setting and comprises parcels of grassland, with scrub and a line of trees to the north, where it is proposed to construct 9 dwellings. The site is bordered by residential properties to the northwest/west, and grassland areas with trees to the north, east and south.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

River Avon Special Area of Conservation (SAC) Hampshire Catchment

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. Appropriate Assessment must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects, and the suitability of any measures proposed to avoid or mitigate those effects.

An Otto Graf PTP is proposed, the PIA certificate of which is included in the nutrient budget statement. It is proposed to upgrade a septic tank at an adjacent property (though within the application's redline boundary) with this PTP. However, it is unclear whether this PTP will serve the adjacent property only, or whether the main development will have its own PTP, or be connected to mains – there is no PTP shown within the development footprint on the proposed plans. Clarification is required.

In any case, there is likely to be an overall increase in phosphate load (currently estimated as 1.54 kg TP/year). A Council-led scheme of phosphorus credits will be available for development which meets certain criteria at a fixed cost per kilogram of phosphorus, provided supply of mitigation is available. The nutrient statement indicates that this, combined with the septic tank upgrade, is the preferred mitigation option. However, the site is outside of a settlement boundary;

the proposal thus does not constitute 'planned' development in terms of the Memorandum of Understanding (with Natural England) and does not fall within the scope of the Council's current mitigation strategy and strategic appropriate assessment. **A bespoke mitigation strategy must therefore be submitted for review to enable the AA to be undertaken. Positive conclusion of the AA must be agreed with Natural England prior to the application being determined.**

Protected species and habitats

Habitats

The site is ~60m north of the River Avon SAC and SSSI. A vegetated boundary is shown on the plans along the southern border which, alongside the intervening 60m stretch of grassland, will help to buffer the development from the river. However, measures should be implemented during the construction phase to ensure that this habitat is protected – **a Construction Environmental Management Plan (CEMP) should be secured via condition.**

Great Crested Newts (GCN)

GCN are a European Protected Species afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that GCN are not adversely affected as a result of the proposed development must be submitted as part of the proposal.

As per OS maps, there are ponds 90m and 120m southwest of the application site, and the site contains some habitats that might be suitable for use by GCN during their terrestrial phase. Instead of carrying out site-specific mitigation and compensation, the applicant has opted to apply to Natural England's District Level Licensing (DLL) scheme. The Impact Assessment and Conservation Payment Certificate (IACPC) has been submitted, with the correct corresponding plan shown in Annex 3.

However, the IACPC must be signed by the applicant and countersigned by Natural England at the planning stage (as per guidance at [Great crested newts: district level licensing for local planning authorities - GOV.UK](#)). At present, it appears to only have been countersigned. **It is understood that the completed and signed document is forthcoming (and must be provided prior to determination). Once submitted, the Council will be able to accept the certificate and a GCN DLL informative should be applied.**

Bats

No potential roosting features were noted on any trees proposed for removal. The site connects to habitats that are suitable for use by foraging and commuting bats. In particular, there is a mature hedgerow to the east that extends 150m south. This hedgerow is adjacent to the redline boundary. Any new lighting should be designed to avoid directly illuminating such features, be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals. **A wildlife-sensitive lighting scheme should be secured via a planning condition.**

Water vole

Water voles are a declining species and categorised as a species of principle importance (Priority Species) in England under section 41 of the Natural Environment and Rural Communities Act (2006). Potential evidence of water vole was observed along the southern fenceline (approaching

the river and outside of the site's redline boundary); there are a number of historical water vole records associated with this stretch of river. Although the development is set back from the river, and from the location of the potential vole burrows (by at least 70m), measures to avoid negatively impacting the river and riverbank, to be secured via a CEMP (as above), will minimise the risk posed to this species.

Other

Two disused burrows were recorded at the north of the site, though no active setts, or other evidence of badger activity, was noted. Nonetheless, it is possible that badgers use the site for foraging and commuting. Precautions for badgers must be detailed within the CEMP.

The CEMP should also include measures to reduce the risk posed to other wildlife, such as nesting birds and reptiles. The site is generally sub-optimal for reptiles, but there are areas of suitable vegetation at, e.g., the treeline.

Biodiversity enhancements

In line with NPPF and with CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. As such, the ecology report's recommended enhancements of integrated bat boxes (one per dwelling), house martin boxes (or similar), bee bricks and wildlife-friendly planting are welcomed. **Submission and implementation of a full enhancement plan should be secured via condition.**

Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory metric calculation, map (*Biodiversity Net Gain, BN Ecology, February 2026; Statutory Biodiversity Metric, James Mansfield, April 2026*) and condition assessment sheets estimating the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	1.04 Habitat units
	0.19 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured. It is proposed to deliver BNG onsite through the creation of other neutral grassland, vegetated gardens, trees and green roofs.

IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected sites. The information outlined above must therefore be

submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: wording can be provided once above issues resolved.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
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